LIBRARY
SUPREME COURT, U. S.

AUG · 5 1970

E. ROBERT SEAVER, CLERK

IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1970

No. 355

MICHAEL JACKSON, b/n/f, his father, JOE W. JACKSON; JOE W. JACKSON; DOROTHY F. JACKSON; BARRY STEVEN BARNES, b/n/f, his father, BILLY BARNES; BILLY BARNES; and SHIRLEY BARNES,
Petitioners,

vs.

C. R. DORRIER, K. HARLAN DODSON, JR., FRANK GRISHAM, L. C. BIGGS, I. T. CRESWELL, MRS. IRWIN B. ESKIND, WALDEN S. FABRAY, MRS. C. F. MAGER, and S. L. WRIGHT, JR., all being members of the Metropolitan County Board of Education of Nashville, Davidson County, Tennessee; DR. JOHN H. HARRIS, Metropolitan Director of Schools; and JIMMY EDWARDS, Principal of Donelson High School,
Respondents.

RESPONDENTS' BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

ROBERT E. KENDRICK
Deputy Metropolitan Attorney
Metropolitan Government of Nashville and Davidson County, Tennessee
204 Metropolitan Courthouse
Nashville, Tennessee 37201
Attorney for Respondents

E. L. MENDENHALL, INC., 926 Cherry Street, Kansas City, Mo. 64106. HArrison 1-3030

INDEX

Questions Presented 1
Statement of the Case 3
Argument for Not Granting the Writ 10
Conclusion 14

Appendix

Affidavit of Joseph R. Garrett A1

Table of Authorities

CASES:

Akin v. *Board of Education*, 393 U.S. 1041 (1969) 14
Bishop v. *Colaw*, No. 70C 111(2) (E.D. Mo. July 24, 1970) (unreported) 12
Breen v. *Kahl*, 419 F.2d 1034, 1037 (7th Cir. 1969) 10, 14
Contreras v. *Merced Union High School District*, No. F-245-CIV (E.D. Calif. Dec. 13, 1968) [unreported, cited in *Sims* v. *Colfax*, 307 F. Supp. 485, 488 (Iowa 1970)] 11
Corley v. *Daunhauer*, No. LR-70-C-14 (E.D. Ark. May 8, 1970) (unreported) 11
Farrell v. *Smith*, 310 F. Supp. 732 (D. Me. 1970) 11
Ferrell v. *Dallas Independent School District*, 392 F.2d 697 (5th Cir. 1968), *cert. denied*, 393 U.S. 856 (1968) 10, 12, 13, 14
Gfell v. *Rickelman*, No. C 69 1007 (N.D. Ohio April 28, 1970) (unreported) 11
Giangreco v. *Center School District*, Civ. No. 17661-3 (W.D. Mo. Sept. 25, 1969) [unreported, cited in *Jackson* v. *Dorrier*, 424 F.2d 213, 218 (6th Cir. 1970)] 11

Griffin v. *Tatum*, 425 F.2d 201 (5th Cir. 1970) *reversing in part*, 300 F. Supp. 60 (M.D. Ala. 1969) 12

Jackson v. *Dorrier*, 424 F.2d 213, 216-217 (6th Cir. 1970) 10, 12, 13

Lovelace v. *Leechburg Area School District*, 310 F. Supp. 579 (W.D. Pa. 1970) 12

Marshall v. *Oliver*, *cert. denied*, 385 U.S. 945 (1966) 11, 14

Pritchard v. *Spring Branch Independent School District*, 308 F. Supp. 570 (S.D. Texas 1970) 11

Schwartz v. *Galveston Independent School District*, 309 F. Supp. 1034 (S.D. Texas 1970) 12

Shows v. *Freeman*, 230 So.2d 63 (Miss. 1969) 12

Wood v. *Alamo Heights Independent School District*, 308 F. Supp. 551 (W.D. Texas 1970) 11

UNITED STATES CONSTITUTION:

First Amendment 2, 3, 9

Third Amendment 2, 9

Fourth Amendment 2, 9

Fifth Amendment 2

Ninth Amendment 2, 9

Fourteenth Amendment 2, 3, 9

STATUTES:

Tenn. Code Ann. § 49-1708 ..... 9, 13

REGULATIONS:

Guide for Professional Personnel of the Public Schools of Metropolitan Nashville-Davidson County, Tennessee, § 16 3

IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1970

No. 355

MICHAEL JACKSON, b/n/f, his father, JOE W. JACKSON; JOE W. JACKSON; DOROTHY F. JACKSON; BARRY STEVEN BARNES, b/n/f, his father, BILLY BARNES; BILLY BARNES; and SHIRLEY BARNES,

Petitioners,

vs.

C. R. DORRIER, K. HARLAN DODSON, JR., FRANK GRISHAM, L. C. BIGGS, I. T. CRESWELL, MRS. IRWIN B. ESKIND, WALDEN S. FABRAY, MRS. C. F. MAGER, and S. L. WRIGHT, JR., all being members of the Metropolitan County Board of Education of Nashville, Davidson County, Tennessee; DR. JOHN H. HARRIS, Metropolitan Director of Schools; and JIMMY EDWARDS, Principal of Donelson High School,

Respondents.

RESPONDENTS' BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

QUESTIONS PRESENTED

(1) Whether requiring as a condition to remaining in a public school a male student (whose unusually long

hair has disrupted classroom atmosphere and decorum, caused disturbances and distractions among other students, interfered with the educational process, and created problems of school discipline) to cut his hair to an extent that it will not be a disturbing influence in class or school violates a right of privacy of the student or his parents under the First, Third, Fourth, Fifth, Ninth, and Fourteenth Amendments.

(2) Whether, if a male public school student and his parents have a right of privacy which embraces his wearing of unusually long hair, this right is paramount to the right and obligation of public school authorities to require him as a condition to remaining in school to cut his hair pursuant to a pre-existing regulation to a length that he will not continue to be such a disturbing influence in class and school as to impede teachers and administrators in carrying out their duties to provide an education, as to interfere with the rights of other students to receive instruction free of such disturbances, and as to create problems of school discipline.

(3) Whether the suspension of a male student from public high school, under a regulation authorizing the suspension of a student whose mode of dress causes him to be a disturbing influence in class or school, when his unusually long hair has disrupted classroom atmosphere and decorum, caused disturbances and distractions among other students, interfered with the educational process, and created problems of school discipline, violates the due process clause of the Fourteenth Amendment.

(4) Whether suspending from public high school a male student (whose unusually long hair has disrupted classroom atmosphere and decorum, caused disturbances and distractions among other students, interfered with the educational process, and created problems of school

discipline) under a pre-existing regulation authorizing the suspension of a student whose mode of dress causes him to be a disturbing influence in class or school is "abridging the freedom of speech" in violation of the First Amendment.

(5) Whether a regulation which authorizes the suspension of a public school student who "is a disturbing influence in class or school because of his mode of dress," which is interpreted in advance to a male student whom it regulates as including hair beyond a specified length, and which is applied to the same student whose unusually long hair has disrupted classroom atmosphere and decorum, caused disturbances and distractions among other students, interfered with the educational process, and created problems of school discipline is an unreasonable classification in violation of the equal protection clause of the Fourteenth Amendment.

STATEMENT OF THE CASE

The Metropolitan County Board of Education of Nashville and Davidson County, Tennessee (hereinafter "the Board"), has a regularly adopted policy that:

> "Pupils shall observe modesty, appropriateness, and neatness in clothing and personal appearance. A student is not appropriately dressed if he is a disturbing influence in class or school because of his mode of dress. The principal may suspend a student who does not meet this requirement." (A. 176, 97).

Under this policy the students at Donelson High School are told, as to hair on male students, that hair in the front may not come below the eyebrows, ears must show clear of hair, hair in the back is to be tapered and not be long enough to turn up, and there is to be no moustache and no beard (A. 76). These rules as to hair are communi-

cated to Donelson students each year by announcements over the intercom, they are announced in assembly programs, they are discussed in home rooms, and they are the subject of conferences with individual students (A. 75-76, 72).

The infant petitioners in this case, Michael Jackson and Barry Barnes, while students in Donelson High School, began to run afoul of the above rules during the 1967-68 school year. During that year Jackson and Barnes were active in a rock combo, the Purple Haze, whose members were long-haired young males. Barnes was absent 38 days, and Jackson was absent 46 days and tardy 24 days during that year (A. 173, 174-175, 109, 113-114), Jackson missing one of his classes 61 days during the year (A. 104). Jackson admittedly missed school several times because of Purple Haze engagements (A. 38, 105-106). The Principal, Jimmy Edwards, wrote Jackson's parents in October 1967 concerning Jackson's absences and tardiness, remarking that Jackson came by the school on some nights when he had been absent during the day, and played with his group for the school's homecoming dance one night when he had been absent from school the same day (A. 172, 78). Jackson's absences and tardiness created disturbances in his classrooms (A. 109-110, 113-114, 106), he appeared resentful at being given make-up work, and his attitude seemed to be to get by with as little work as possible to pass (A. 113-114). The grades of both boys dropped off, Jackson ending the year with grades of D, C, F, D, D+, and B (Physical Education) in his various courses (A. 173), and Barnes with grades of D, F followed by a drop, D, D+, C+ (Art), F, and B (summer 1967) in his various courses (A. 174).

In the spring of 1968, Jackson and Barnes had long hair but not as long as it was when they attempted to

re-enter school on September 3, 1968, for the next term (A. 19-20, 27, 42, 54, 105), and Barnes did not have bangs, a moustache, a beard, and sideburns extending to the jaw in the spring of 1968, although he had them in the fall of 1968 (A. 28). Conferences with the principal about hair occurred during the 1967-68 school year, in which the principal told Barnes he would have to get his hair cut before returning to school (A. 45). Barnes' mother told the principal that he would not return to Donelson in the fall of 1968, but would change schools (A. 29), and the principal allowed Barnes and Jackson to finish out the year at Donelson (A. 29, 40-41).

However, even by now, the long hair was a disturbing factor in class from the standpoint of teachers (A. 186, 120-122). Barnes appeared sullen at remarks students made about his hair, and became more of a problem (A. 121-122).

On May 22, 1968, the manager of Barnes' and Jackson's combo sent by Barnes a letter to the principal, stating that if the principal made Barnes cut his hair the manager would take the principal to court (A. 45).

Although the complaint (A. 5) states that during the summer the Purple Haze played without difficulty or trouble, there were several occasions when disturbances seemed to be on the verge of occurring involving one or more of these long-haired youths. At Dons Den, a place for dances and other functions for Donelson High students (A. 60), on August 2, 1968 (A. 154-155), one of the Purple Haze, Randy Kennedy, upon hearing that a member of the Donelson football squad was talking about cutting Barnes' hair, stated from the stage loud enough for others to hear (A. 63-64) that if anybody wanted to cut Barnes' hair to come on up there (A. 154-155). Kennedy testified: "We're very proud of what we've got. If

it is long hair, we'll fight for it and they wanted to fight. They were agitating us and antagonizing us and we told them to come on." (A. 64).

On August 16, 1968, at Donelson Plaza, a shopping center, a contest between rock bands, called the "Battle of the Bands" was held (A. 47). It had been rumored that a group of boys from Hume-Fogg High School, another school in Nashville-Davidson County, were threatening to appear at the contest and cut Barnes' and Jackson's hair and hair of other long-haired boys (A. 48, 55-56). One member of the Purple Haze asked a nonmember to be present in case trouble started (A. 137). The boys that came, however, were told to leave by Donelson football players "who were on our [Purple Haze] side" (A. 62).

When the new school term opened on September 3, 1968, Barnes and Jackson presented themselves at Donelson High with unusually long hair on various parts of their faces. Jackson had hair over the lapel of his coat in the back, down to the tip of his ear lobes on the side, and sideburns and a moustache (A. 19-20). Barnes had a moustache and beard, sideburns down to the jaw, and hair to the shoulders (A. 28). The Court characterized their hair as "being very long, completely covering their ears and hanging below their collars. In addition, both students wore moustaches and one also wore a beard" (A. 179). There were no other students and no teachers at Donelson with moustaches or beards, and no other male students there with hair so long as Barnes' (A. 42, 44).

On this first day of school, when Jackson came to his homeroom, several students made comments to the teacher about Jackson's hair disturbing the room, in the teacher's opinion (A. 111). Other students in the class talked among themselves in the classroom about the long hair,

terming it "ridiculous" and speculating that Barnes and Jackson would be "kicked out" (A. 127). Jackson's shop teacher told him that under shop safety rules he would be unable to participate in the shop work because the length of his hair and beard was a hazard, and the teacher considered Barnes' presence in the shop class under those circumstances a disturbance in the class (A. 107). When Barnes walked by the classroom door of another teacher, his appearance completely disrupted the class for about five minutes (A. 184). The excitement continued even on the football practice field, as Barnes and another member of the Purple Haze drove up to the field in a car on September 3, 1968, resulting in a number of the players coming over to have a look (A. 50-52, 137-138).

The principal invoked the previously-announced rules and sent Barnes and Jackson home on September 3 on suspensions for violating those rules. The principal followed the Board's procedures for suspension of pupils as set out in Article V, paragraph 3 of the Guide for Professional Personnel (A. 84-85, 168). There were conferences with parents of the boys (A. 79, 84), suspension forms were filled out with copies sent to the parents (A. 85), and the case was referred to the Pupil Personnel Department (A. 85). The Director of Pupil Personnel Services had a conference with parents of Barnes and Jackson (A. 86-89), in which she advised them of their right to go to the Director of Schools and to the Board (A. 88). The parents went to the Board, which waived a rule requiring at least a 3-day notice of a request for a hearing, and which on September 19, 1968, heard the parents (A. 170-171). The parents were allowed to make complete statements and to question the principal before the Board (A. 100-101). The Board sustained the principal's action (A. 171).

The complaint states that "The sole purpose for Barnes and Jackson's appearance is to enhance their profession" (A. 5). As noted above, the then manager of Barnes' and Jackson's combo (Robert E. Benderman) had on May 22, 1968, stated that if the principal made Barnes cut his hair the manager would take the principal to court (A. 45). The complaint further stated that the promoter of the Purple Haze, Emiley Bradshaw, had "at all times supported their right to maintain their appearance," believing the group's popularity would diminish if the boys were required to cut their hair (A. 4-5). The parents made the plea to the Director of Pupil Personnel Service that to have long hair was important to the boys' "profession" (A. 88), and Jackson's mother asked the Board to consider letting the boys back in school "with their hair like that because of their profession" (A. 16). The press covered the efforts that were being made to get these Purple Haze members back in school without haircuts (A. 90-93). One of the members of the Purple Haze, Joseph Byron Ingram, in a discussion about the combo with one of his teachers, David Keith Scott, told Mr. Scott on September 20, 1968, that "the agent was trying to get as much publicity as it is possible from this proceeding," the "proceeding with Mr. Barnes and Mr. Jackson concerning the hair suspension from school" (A. 110-111). And during September 1968 (A. 56-57) Jackson in response to a comment by a teacher, Paul E. Pigue, that "you sure got a lot of publicity out of this, haven't you?" answered, "Yes, that was one of the main reasons. We got three jobs out of it already" (A. 107).

After the trial of this case, one of the infant petitioners, Michael Stephen Jackson, returned to the Donelson High School and graduated therefrom on June 9, 1970; and the other infant petitioner, Berry Stevens

Barnes, also returned to school after reaching the age of 17, at which age the Tennessee compulsory school attendance law, Tenn. Code Ann. §49-1708,* no longer applies, dropped out of the Donelson High School on February 20, 1970. See Appendix hereto, *infra*.

Jackson and Barnes' complaint was dismissed in the United States District Court for the Middle District of Tennessee (A. 156-165), after an evidentiary hearing. The Court ruled on only three issues: (1) Did the action of the school officials infringe on Jackson's and Barnes' First Amendment right of freedom of expression? (2) Did the officials deny Jackson and Barnes of the right to a free public education without due process of law as required by the Fourteenth Amendment, because of failure to afford them a hearing or because the regulation applied to them was vague, overbroad, and undefinable? (3) Did the officials through the regulation and action taken deprive these students of equal protection of the laws guaranteed by the Fourteenth Amendment—did the regulation operate as an unreasonable classification or was it selectively enforced against them? These were the issues raised by the complaint (A. 6), and asserted by counsel at the hearing (A. 9-10). The court ruled against Jackson and Barnes on each of these issues. There was nothing in the pleading or argument about "privacy" or the Third, Fourth, or Ninth Amendments. Yet, Jackson and Barnes assigned to the Court of Appeals for the Sixth Circuit "errors" based on these "issues." The Court of Appeals affirmed the District Court judgment on every

* Tenn. Code Ann. §49-1708: "Every parent, guardian, or other person residing within the state of Tennessee, having control or charge of any child or children between the ages of seven (7) and sixteen (16) years, both inclusive, shall cause such child or children to attend public or private day school, and in event of failure to do so, shall be subject to the penalties hereinafter provided."

point, "holding that the District Court committed no error in dismissing the present case." *Jackson* v. *Dorrier*, 424 F.2d 213, 219 (6th Cir. 1970).

See also the Court of Appeals' statement of facts. 424 F.2d at 215-217.

ARGUMENT FOR NOT GRANTING THE WRIT

1. Petitioners are wrong in contending that the Courts of Appeals are in conflict as to the questions in the instant case. Respondents believe that the Seventh Circuit, which decided *Breen* v. *Kahl*, 419 F.2d 1034 (7th Cir. 1969), *cert. denied*, 90 S.Ct. 1836 (1970), and the Fifth Circuit, which decided *Ferrell* v. *Dallas Independent School District*, 392 F.2d 697 (5th Cir. 1968), *cert. denied*, 393 U.S. 856 (1968), both would have decided the instant case (had they had it) on its record the way the Sixth Circuit did, affirming the district court in upholding the suspensions by the board of education. The Seventh Circuit distinguished the *Breen* case on its facts from the Sixth Circuit's *Ferrell* decision, citing the *Breen* trial court's finding that there was not "any disruption or disturbance caused by the length of his hair." *Breen* v. *Kahl*, 419 F.2d 1034, 1037 (7th Cir. 1969). In the instant case, the Court of Appeals for the Sixth Circuit found "substantial evidence in the record" to support the conclusion that excessively long hair by male students in the Donelson High School "disrupted classroom atmosphere and decorum, caused disturbances and distractions among other students and interfered with the educational process," and that the infant petitioners' excessively long hair had produced such results in that school and had "created problems of school discipline." *Jackson* v. *Dorrier*, 424 F.2d 213, 216-217 (6th Cir. 1970).

A fair analysis of the United States District Court decisions and the state court decisions cited at pages 5-7 in the Petition for Certiorari herein indicates general agreement among the lower courts that a school board may constitutionally formulate and apply a hair regulation so as to dismiss a male student whose long hair has been substantially disrupting the school, the classroom, and the educational process.

In addition to the eight cases cited by petitioners at pages 6-7 of their petition, the following decisions have upheld the application of hair regulations:

9. *Marshall* v. *Oliver*, Circuit Court of the City of Richmond, Virginia, No. B-2932, December 20, 1965 (unreported), *cert. denied*, Virginia Supreme Court of Judicial Appeals, November 23, 1965 (unreported), *cert. denied*, 385 U.S. 945 (1966).

10. *Contreras* v. *Merced Union High School District*, No. F-245-CIV (E.D. Calif. Dec. 13, 1968) [unreported, cited in *Sims* v. *Colfax*, 307 F. Supp. 485, 488 (Iowa 1970)].

11. *Gianiggeco* v. *Center School District*, Civ. No. 17661-3 (W.D. Mo. Sept. 25, 1969) [unreported, cited in *Jackson* v. *Dorrier*, 424 F.2d 213, 218 (6th Cir. 1970)].

12. *Wood* v. *Alamo Heights Independent School District*, 308 F. Supp. 551 (W.D. Texas 1970).

13. *Pritchard* v. *Spring Branch Independent School District*, 308 F. Supp. 570 (S.D. Texas 1970).

14. *Farrell* v. *Smith*, 310 F. Supp. 732 (D. Me. 1970).

15. *Gfell* v. *Rickelman*, No. C 69 1007 (N.D. Ohio April 28, 1970) (unreported).

16. *Corley* v. *Daunhauer*, No. LR-70-C-14 (E.D. Ark. May 8, 1970) (unreported).

17. *Bishop* v. *Colaw*, No. 70C 111(2) (E.D. Mo. July 24, 1970) (unreported).

18. *Shows* v. *Freeman*, 230 So.2d 63 (Miss. 1969).

Of course, *Ferrell* v. *Dallas Independent School District*, 392 F.2d 697 (5th Cir. 1968), *cert. denied*, 393 U.S. 856 (1968); and the instant case, *Jackson* v. *Dorrier*, 424 F.2d 213 (6th Cir. 1970), are to the same effect, bringing the number of such decisions to twenty. See also, *Schwartz* v. *Galveston Independent School District*, 309 F. Supp. 1034 (S.D. Texas 1970) and *Lovelace* v. *Leechburg Area School District*, 310 F. Supp. 579 (W.D. Pa. 1970). And see *Griffin* v. *Tatum*, 425 F.2d 201 (5th Cir. 1970), *reversing in part*, 300 F. Supp. 60 (M.D. Ala. 1969), a decision relied on by petitioners herein at page 6 of their Petition for Certiorari.

2. Petitioners incorrectly state that "The court below . . . concluded that the slightest inconvenience or disturbance within the public school system" justifies subordinating a child's right to whatever manner of appearance he desires to "tenuous and speculative state interests." The truth is that the Court of Appeals concluded that "The District Court made a finding of fact to the effect that the regulation here attacked, as interpreted and enforced by the principal of Donelson High School, has a real and reasonable connection with the successful operation of the educational system and tends to help maintain school discipline * * * We find substantial evidence in the record to support the findings of the District Judge. There is evidence to support the conclusion that the wearing of excessively long hair by male students at Donelson High School disrupted classroom atmosphere and decorum, caused disturbances and distractions among other students and interfered with the educational process."

Jackson v. *Dorrier*, 424 F.2d 213, 216 (6th Cir. 1970). And, see the same source at pages 216-217 detailing the evidence of record of disturbances and distractions in the Donelson High School caused by these two infant petitioners leading the Court to conclude that "The Record establishes that the deliberate flouting by Jackson and Barnes of this well publicized school regulation created problems of school discipline." *Id.* at 217.

Certainly the record in this case well establishes the fact that more than slight inconveniences or disturbances occurred. And, how can it fairly be said in these days of disorder and turmoil on many campuses that the state interests in having instruction and learning going on in a school of hundreds of other students without distraction and interference, and in maintaining school discipline, are "tenuous and speculative"?

3. The record, quoted and referred to hereinabove, is contrary to the assertion at page 7 of the Petition for Certiorari herein that "Here, unlike *Ferrell*, there was no public display, no substantial disruption of school functions . . . ."

4. A further reason for not granting a Writ of Certiorari herein is that the case has become moot. After the trial was held and the record made, both infant petitioners returned to the Donelson High School, and one of them, Michael Stephen Jackson, graduated therefrom on June 9, 1970, while the other, Barry Steven Barnes, dropped therefrom on February 20, 1970, for "lack of interest in school," following attainment of the age of 17 at which age he was no longer compelled by the state compulsory attendance law. (Tenn. Code Ann. §49-1708, quoted at p. 9, *supra*). See Appendix hereto, *infra*.

CONCLUSION

Four times now, the Supreme Court has denied certiorari in "hair" cases:

Marshall v. *Oliver*, 385 U.S. 945 (1966).

Ferrell v. *Dallas Independent School District*, 393 U.S. 856 (1968).

Akin v. *Board of Education*, 393 U.S. 1041 (1969).

Breen v. *Kahl*, 90 S.Ct. 1836 (1970).

Respondents believe that the Court denied certiorari in all of the cases, being satisfied in each of the first three that on the record the "hair" regulation was constitutionally applied under circumstances of disruption of educational processes and discipline, whereas, in the fourth case the record did not disclose any disruption or disturbance caused by long hair so as to justify the application of the regulation to suspend student violators thereof. In the instant case, the record is replete with substantial evidence of such disruption of the educational process and of school discipline. The regulation and its application were therefore justified in implementing the state's overriding concern for instruction and learning without disruption and for discipline in the school and classroom. And these are very real and important concerns in these times—far from the mocking description of "makeweights and vague generalities."

ROBERT E. KENDRICK
Deputy Metropolitan Attorney
204 Metropolitan Courthouse
Nashville, Tennessee 37201
Attorney for Respondents

G R A D U A T E

Pupil: Jackson (Last) Michael (First) Stephen (Middle)

Birthdate: 10-21-51

Race: ☐ NEGRO ☒ WHITE ☐ OTHER

Parents: Mr. and Mrs. Joe W. Jackson

School: Donelson High School

Principal: Jimmy Edwards. Date Leaving: 6-9-70
(Month)-(Year)

A2

STATISTICAL DROPOUT CARD

(1)

Name Barnes, Barry Steven Birthdate 3/8/52 M ✓ F
(last) (first) (middle)

Date of Dropping Out Feb 24-1970 School Donelson High Age When Dropped 17

Address 6639 Cortez W Grade 10 Phone 883-1761

Parent or Guardian (circle one) Mr. & Mrs. Billy B. Barnes

Financial Status: Low ____ Middle ✓ Upper ____

Physical Health: Poor ____ Average ✓ Above Average ____

Status of MAJORITY of Pupil's Work at Time of Dropout: Passing ✓ Failing ____

Pupil was Working at ____ Below ____ or Above ____ Grade Level

Attendance Record: Poor ____ Average ____ Above Average ____

Elementary School Record: Grades Repeated (specify each grade repeated) 3 grade

Total No. Schools Attended 4 Special Education Class: Yes ____ No ✓

Reason for Leaving as Determined by School: Lack of interest in school

Test Results:

	I.Q.	Reading	Achievement Test Batt. Mdn.
Score	113	45	45
Test	Otis Quick-Scoring	Metropolitan Achievement	Metropolitan Achievement
Date	10/62	9/67	9/67

A3

NOTICE OF TRANSFER—METROPOLITAN SCHOOLS OF NASHVILLE AND DAVIDSON COUNTY—NASHVILLE, TENNESSEE

	Last Name	First	Middle	Grade	Birthdate	Sex B	Sex G
Pupil	BARNES	BARRY	STEVEN	11	3-8-52	X	
Parent or Guardian:	MR. AND MRS. BILLY BARNES				Occupation		

Data from School Child is Leaving

1. Name of School: Donelson High
2. Pupil's Old Address: Hermitage, Tenn
3. Date of Last Attendance: 2-20-70
4. No. Days on Roll: 102 5. No. Days Pres.:
6. Times Tardy: 7. Unexcused Abs.:
8. Date Pupil Withdrawn: 2-20-70
9. Jimmy Edwards
   Principal

Please fill in items 10-15 and return to Central Office, Metropolitan Schools of Nashville and Davidson County, Nashville, Tenn.

Data on School Child is Entering

10. Name of School: DROPPED W7
11. P. O. Address:
12. Pupil's New Address:
13. With Whom Living:
14. Date Child Entered:
15.

Principal

Make in triplicate. Give WHITE copy to child for new principal. Attach PINK* copy to the cumulative record. If transferring out of the Metro. System, send by delivery to the Central Office. If transferring to another Metro. School, send on delivery directly to the school.

*Data, if available, should be entered by the sending teacher or principal. Be sure to secure new address.

A4